

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN PRODUCTS  
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO ALL  
CASES

MDL No. 2875

Civil Case No. 19:2875 (RBK/JS)

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO PERIPHERAL  
DEFENDANT PREFERRED PHARMACEUTICALS, INC.**

**WHEREAS** the Court entered Case Management Order No. 15, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-containing drugs ("VCDs");

**WHEREAS**, Peripheral Defendant Preferred Pharmaceuticals, Inc. ("PPI") having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein;

**IT IS HEREBY STIPULATED AND AGREED** between Plaintiffs Executive Committee and PPI that all current cases pending and all future cases to be filed in this MDL alleging claims against PPI in connection with allegedly contaminated VCDs be and hereby are dismissed without prejudice.

/s/ Marlene J. Goldenberg

Marlene J. Goldenberg  
(MN Bar ID: 0394943)  
**GOLDENBERGLAW, PLLC**  
[mjgoldenberg@goldenberglaw.com](mailto:mjgoldenberg@goldenberglaw.com)  
800 LaSalle Avenue, Suite 2150  
Minneapolis, MN 55402  
Tel.: (612) 333-4662  
Fax: (612) 367-8107  
On behalf of the Plaintiffs Executive  
Committee

Dated: August 5, 2020

/s/ Kelly A. Waters

Kelly A. Waters  
(NJ Bar ID: 030301991)  
**WOOD SMITH HENNING & BERMAN, LLP**  
400 Connell Drive, Suite 1100  
Berkeley Heights, New Jersey 07922  
973-265-9914  
[kwaters@wshblaw.com](mailto:kwaters@wshblaw.com)

Attorneys for Peripheral Defendant,  
Preferred Pharmaceuticals, Inc.

Dated: July 21, 2020